

**PLAINTIFF'S MOTION  
EXHIBIT 31**

1 L. ALDANA-BERNIER

2 do you mean?

3 Q. Sure.

4 Well, you used the word  
5 "potential." I would like to know what  
6 you mean by potential.

7 A. If you think of the navy yard  
8 disaster, was he an officer or army man?  
9 He was so quite, no one ever found out  
10 what was going on with him. So what  
11 happened then?

12 Or if you look at all of those  
13 -- the Range Rover. Who are all of these  
14 people that caused that? They are all  
15 police officers.

16 So if I think then I have to  
17 make sure that when I see a patient in  
18 the ER, I have to think in the future  
19 that there will be no disaster, there  
20 will be no destruction, or no one will  
21 get harmed when they were discharged from  
22 the ER.

23 Q. I was asking about what you  
24 meant by potential.

25 A. That's the potential.

1 L. ALDANA-BERNIER

2 Q. So if there is any potential at  
3 all, you want to make sure that the  
4 patient is safe, correct?

5 A. Correct.

6 Q. And if there is any potential  
7 at all, you want to make sure the  
8 community is safe, correct?

9 A. That's correct.

10 Q. And if there is any potential  
11 at all, you were going to admit Mr.  
12 Schoolcraft, correct?

13 MR. LEE: Objection to form.

14 A. With all of those reasons, yes,  
15 I would have to admit him.

16 Q. When you admitted him to the  
17 emergency room, there were certain rules  
18 and regulations --

19 MR. SUCKLE: Withdrawn.

20 Q. When he was admitted to the  
21 psych floor, there were certain rules and  
22 regulations in the psych ward, correct,  
23 about clothes they wear, what hours  
24 visitors can come, correct?

25 A. Yes.